

## Appointment

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**From:** O'Neill, Sandra [ONeill.Sandra@epa.gov]  
**Sent:** 5/29/2021 12:18:12 PM  
**To:** O'Neill, Sandra [ONeill.Sandra@epa.gov]; Arrington, Linda [Arrington.Linda@epa.gov]; Friedman, Dana [Friedman.Dana@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]; Sappington, Keith [Sappington.Keith@epa.gov]; Olinger, Christine [Olinger.Christine@epa.gov]; Huskey, Angela [Huskey.Angela@epa.gov]; Knorr, Michele [knorr.michele@epa.gov]; Bartow, Susan [Bartow.Susan@epa.gov]; Javier, Julie [Javier.Julie@epa.gov]; Muhammad, Maryam K. [Muhammad.Maryam@epa.gov]; Gavin, Quinn [Gavin.Quinn@epa.gov]; Colby, Deanna [colby.deanna@epa.gov]; Steeger, Thomas [Steeger.Thomas@epa.gov]; Aranda, Amber [aranda.amber@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]  
**CC:** Hopkins, Yvette [Hopkins.Yvette@epa.gov]; Picone, Kaitlin [Picone.Kaitlin@epa.gov]; Emdur, Zoe [Emdur.Zoe@epa.gov]; Koch, Erin [Koch.Erin@epa.gov]

**Subject:** Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg  
**Location:** Microsoft Teams Meeting

**Start:** 6/1/2021 4:00:00 PM  
**End:** 6/1/2021 5:00:00 PM  
**Show Time As:** Busy

**Required Attendees:** Arrington, Linda; Friedman, Dana; Costello, Kevin; Sappington, Keith; Olinger, Christine; Huskey, Angela; Knorr, Michele; Bartow, Susan; Javier, Julie; Muhammad, Maryam K.; Gavin, Quinn; Colby, Deanna; Steeger, Thomas; Aranda, Amber; Swartz, Christina  
**Optional Attendees:** Hopkins, Yvette; Picone, Kaitlin; Emdur, Zoe; Koch, Erin

Greetings all,

The purpose of this meeting is to prepare for the Neonicotinoid Treated Seed Issues session at the Full SFIREG June 8 meeting. SFIREG's questions for this session are below. We want to make sure we have the right group of people to weigh in on the questions. Please feel free to forward to any that should be included.

### SFIREG Questions for EPA:

- These neonicotinoid treated seeds are exempt from FIFRA regulations per 40 CFR 152.25(a) Treated Articles or Substances; what will it take to see the treated article determination changed?
- When does EPA anticipate finalizing the answers to the coated seed petition?
- How is this situation similar/different from regulating persistence as we have seen in grass clippings, mulch, manure, etc...?
- Are we again looking to regulate beyond the user?
- With changes/improvements in seed coating technology is there an increase in residual presence?
- If so, is this being considered by EPA?
- Were/are the seed treatment associations in contact with EPA?
- Regardless of whether they are considered treated articles under FIFRA, are treated seeds regulated under the Federal Seed Act?
- Does the EPA's risk assessments for pesticides used to treat seeds evaluate the potential risks from exposures to the pesticides from the plant or vegetation that grows from the seeds. If not, would EPA consider an evaluation of these potential risks, as they do for runoff, dusting, and consumption of unsown seed?

If possible, having EPA provide a review of the process for the neonicotinoids approved for treating seeds from OPP-EFED as it relates to environmental exposure and pollinators would be beneficial.

Thanks and please let me know if you have any questions.

Best,  
Sandra O'Neill

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